



May 9, 2002

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TWB-204
Washington, D.C. 20554

Re: *Performance Measurements and Standards for Unbundled Network Elements and Interconnection*, CC Docket Nos. 01-318

Dear Ms. Dortch:

Yesterday, on behalf of WorldCom, Karen Kinard, Senior Staff Member-ILEC Performance, Lisa Youngers, Associate Counsel, and I met with John Stanley, Daniel Shiman, Mark Stone, Uzoma Onyeije, Cathy Zima, Jerry Staushine, Behzad Ghaffari, Ben Childers and Jonathan Kraushaar to discuss WorldCom's position in the UNE Metrics docket.

In addition to the items included in the attached presentation, we emphasized the value of the existing state measures and explained that national measurements could serve two main functions: 1) federal enforcement; and 2) the establishment of uniform national standards. We also explained that benchmarks enable us to better serve our customers and are easier to administer due to the absence of complicated statistical calculations. WorldCom believes that the Commission can set absolute standards by factoring in the ILECs' past performance and setting an appropriate benchmark that the ILECs must meet. In addition, WorldCom's measurements expert, Ms. Kinard, explained that the ILECs would have to do minimal systems development to comply with WorldCom's proposed measurements because most of the measures are included in the state plans in one form or another.

Finally, WorldCom briefly described its proposed enforcement process, which is outlined in the attached presentation.

Sincerely,

/s/

Kimberly Scardino
Associate Counsel
WorldCom
(202) 736-6478

Enclosure

cc: Ben Childers
Behzad Ghaffari
Jonathan Kraushaar
Uzoma Onyeije
Daniel Shiman
Jerry Stanshine
John Stanley
Mark Stone
Cathy Zima